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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CALEB BARNETT, BRIAN NORMAN,
HOOD'S GUNS & MORE, PRO GUN AND
INDOOR RANGE, and NATIONAL
SHOOTING SPORTS FOUNDATION,
INC.,

Plaintiffs,

v.

KWAME RAOUL, Attorney General of
Illinois, and BRENDAN F. KELLY,
Director of the Illinois State Police,

Defendants.

Case No. 3:23-cv-209-SPM

Declaration of James Hood on Behalf of Plaintiff Hood's Guns & More:

I, James Hood, hereby declare as follows:

1. I am over the age of 18 years, and I am qualified to submit this declaration on behalf of Hood's Guns & More.

2. I am the sole owner of Hood's Guns & More, a retail firearms business located in Benton, Illinois. I opened the store approximately nine years ago and have owned and operated it ever since.

3. I have personal knowledge of the facts set forth in this declaration through direct involvement and by personally reviewing Hood's Guns & More records and information.

4. Hood's Guns & More is authorized by law to sell firearms as a Federal Firearms Licensee (FFL 01) licensed by the Bureau of Alcohol, Tobacco, Firearms and Explosives.

5. Over the years 2021 and 2022, Hood's Guns & More purchased from firearms distributors and manufacturers hundreds of thousands of dollars worth of firearms, magazines, and related merchandise. Of that amount, nearly half was attributable to firearms now defined as "assault weapons," and deemed unlawful under the Protect Illinois Communities Act, House Bill 5471 ("HB 5471"), 720 ILCS 5/24-1.9; accessories for the same; and standard-capacity magazines, now defined as "large capacity ammunition feeding devices," under HB 5471, 720 ILCS 5/24-1.10. For reference, see the document produced at HG&M000001-000056.

6. In 2021 and 2022, approximately one-fourth of Hood's Guns & More's gross revenue was attributable to firearms that HB 5471 deems "assault weapons," accessories for the same, and "large capacity ammunition feeding devices."

7. I have no reason to believe that 2023 or 2024 would have been materially different in terms of Hood's Guns & More's sales, but for HB 5471.

8. Hood's Guns & More currently has in its inventory tens of thousands of dollars' worth of firearms and magazines that, under HB 5471, are not unlawful to sell in Illinois, including a number of firearms on the Armalite Rifle ("AR") platform and many AR accessories.

9. But for HB 5471, Hood's Guns & More would sell those products to consumers in Illinois.

10. HB 5471 has already cost Hood's Guns & More considerable money in lost firearm and magazine sales.

11. Absent an injunction Hood's Guns & More will continue to suffer irreparable harm in the form of lost business.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of July 2024.

By: /s/ James Hood
James Hood